

Exhibit G

DYFAN'S FIRST SET OF INFRINGEMENT CONTENTIONS

U.S. Patent No. 10,194,292 – Target Corporation

Claims 1-8, 10-21, and 24-30

Dyfan, L.L.C. (“Dyfan”) accuses Target Corporation (“Target”) of infringing claims 1-8, 10-21, and 24-30 of U.S. Patent No. 10,194,292 (hereinafter “the ’292 Patent”). Dyfan provides the following claim chart. *See* Exhibit B.

This claim chart provides Target notice of identified instrumentalities (including “the Accused System”) that incorporate or reflect the recited claim elements. This claim chart is not intended to be an expert report on infringement or provide detailed analysis of the claim terms or infringement. This claim chart includes information related to an assertion of infringement with respect to identified Target products and services, including diagrams, web page screenshots, and other documentary evidence by way of example and not by way of limitation.

The asserted claims include elements that are implemented, at least in part, by instrumentalities described in confidential information not accessible to Plaintiff. In some instances, the precise processes and algorithms used are, at least in part, not publicly available. An analysis of Target’s (or other third parties’) technical documentation and/or software source code may be necessary to more fully identify all infringing features and functionality. Accordingly, Dyfan reserves the right to supplement these contentions once such information is made available to Dyfan. Furthermore, Dyfan reserves the right to revise these contentions, as appropriate, upon issuance of the Court’s Claim Construction Order.

Target makes, uses, sells, imports, or offers for sale in the United States, or has made, used sold, imported, or offered for sale in the past, without authority, products, equipment, or services that infringe claims 1-8, 10-21, and 24-30 of the ’292 Patent, including without limitation, the Target mobile application for iOS [Apple Store ID Number 297430070] or Android [Play Store ID com.target.ui] in conjunction with back-end server(s) and in-store beacon broadcasting units. The claim chart refers to the Accused System and the aforementioned products are included in (or can operate in conjunction with) the Accused System, as noted in the claim chart. To the extent the below claim chart relies on evidence for the Accused System, Dyfan asserts that, on information and belief, any similarly-functioning system also infringes the charted claim. Dyfan reserves the right to amend these infringement contentions with other products made, used, sold, imported, or offered for sale by Target. Dyfan also reserves the right to amend these infringement contentions by citing other claims of the ’292 Patent, not listed in the claim chart, that are infringed by the Accused System. Dyfan further reserves the right to amend these infringement contentions by adding, subtracting, or otherwise modifying content in the “Accused System” section. To the extent there are any differences between the accused instrumentalities and the following claim elements, any such differences are insubstantial and are alleged to infringe under the doctrine of equivalents.

EXHIBIT B

Claim 1	Accused System (emphasis or labels added)
<p>A system, comprising: a building including a plurality of facilities therein, the building including: a first broadcast short-range communications unit having a fixed location and configured to:</p>	<p>Target owns or controls <i>a system, comprising: a building</i> (e.g., a store, etc.) <i>including a plurality of facilities</i> (e.g., departments, portions of the store, etc.) <i>therein, the building including: a first broadcast short-range communications unit</i> (e.g., a first beacon broadcast unit, etc.) <i>having a first fixed location</i> (e.g., a first location in a first department/portion of the store, etc.) <i>and configured to:</i></p> <p>Beacon technology is already used by some of North America's top retailers, including Macy's, Target, Urban Outfitters, and CVS."</p> <div data-bbox="651 568 1887 1019"> <p>HOW BEACON TECHNOLOGY WORKS</p> <p>1. Retailers strategically place beacons around their store.</p> <p>2. The Beacons connect to a customer's Bluetooth enabled smartphone app.</p> <p>3. It sends a signal to the phone and the app is opened.</p> <p>4. The retailer can provide the customer with a wealth of information.</p> </div> <p>https://www.shopify.com/retail/the-ultimate-guide-to-using-beacon-technology-for-retail-stores (last visited on April 10, 2019)</p>

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Claim 29	Accused System (emphasis or labels added)
The system of claim 28, wherein the building includes a shopping mall, and the plurality of facilities include different private facilities associated with different brands, and further include at least one public food court that includes at least one public food court broadcast short-range communications unit.	<p>Target stores are a part of a <i>shopping mall</i> (e.g., an outdoor strip mall in which the building that includes the Target store includes other facilities, an indoor shopping mall, or a standalone Target store that includes a café, coffee shop, and/or restaurant in the store separated from the retail shopping area). Upon information and belief, <i>the one or more facilities includes different private facilities associated with different brands</i> (e.g., different stores including, but not limited to, Pizza Hut, Starbucks, etc.). Upon information and belief, <i>the facilities include at least one public food court</i> (e.g., a place to purchase and consume food or drink, such as a café, Pizza Hut, Starbucks, etc.) <i>broadcast short-range communications unit</i>.</p> <p>In addition to the above description, one or more of Target's stores, mobile app, in-store beacons, or backend servers may satisfy this element under the doctrine of equivalents.</p>

Claim 30	Accused System (emphasis or labels added)
The system of claim 28, wherein the building includes a retail space, and the plurality of facilities have different locations in the retail space and are associated with different product types.	Target is a retail store that includes different locations that are associated with different product types. For example, as illustrated below, Target has a Home Décor location that is associated with home décor products, a Girls Jewelry location that is associated with jewelry products, etc.